

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Donqia Jerome Beavers,

Case: 4:21-mj-30533

Judge: Ivy, Curtis

Filed: 11-10-2021

IN RE SEALED MATTER (kcm)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 14, 2021 in the county of Genesee in the Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of a firearm
18 U.S.C. § 922(g)(1)	Carrying a firearm during and in relation to a drug trafficking crime
21 U.S.C. § 841(a)(1)	Possession with intent to distribute controlled substances

This criminal complaint is based on these facts:

There is probable cause that on or about June 14, 2021, in the Eastern District of Michigan, Donqia Jerome Beavers violated 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm); 18 U.S.C. § 924(c) Carrying a Firearm During and in Relation to a Drug Trafficking Crime; and 21 U.S.C. § 841(a)(1) (possession with intent to distribute controlled substances).

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: November 10, 2021

City and state: Flint, MI



*Complainant's signature*

Dustin Hurt, Special Agent, ATF

*Printed name and title*



*Judge's signature*

Curtis Ivy, Jr., United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since October of 2018. I am currently assigned to the Detroit Field Division, Flint Field Office. Before working for the ATF, I was employed by the Michigan Department of State Police (MSP) for approximately seven years. Before working for MSP, I was a local police officer for the Grand Ledge Police Department for approximately three years. I held numerous positions with the MSP, including Detective Sergeant in the Polygraph Unit and Task Force Officer with the FBI. During my employment with ATF and MSP, I have conducted or participated in numerous criminal investigations focused on firearms, armed drug trafficking, and criminal street gangs, and other violations of federal law.

2. I make this affidavit from personal knowledge based on my participation in this investigation, my review of reports and other materials prepared by those who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. Based on the information below, there is probable cause that on June

14, 2021, in the Eastern District of Michigan, Donqia Jerome Beavers (m/b XX/XX/80) violated 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm); 18 U.S.C. § 924(c) Carrying a Firearm During and in Relation to a Drug Trafficking Crime; and 21 U.S.C. § 841(a)(1) (possession with intent to distribute controlled substances).

### **Probable Cause**

4. On June 14, 2021, Genesee County Dispatch aired a call for a domestic disturbance at 3131 Devonshire Street in Flint Township. The Flint Township Police Department (FTPD) responded and while on their way to the address, dispatch added that a suspect from an earlier domestic was on scene in a gray Dodge Ram. FTPD arrived in the area of Devonshire Street and Maxson Avenue when they observed a gray Dodge Ram. FTPD conducted a traffic stop on the gray Dodge Ram bearing MI Registration EKH0905. A Law Enforcement Information Network (LEIN) check of the registration yielded the vehicle was a 2014 Dodge Ram 1500 registered to a Donqia Jerome Beavers.

5. FTPD asked the male driver to exit the vehicle who was then identified as Donqia Jerome Beavers (m/b XX/XX/80) via his Michigan Driver's License. Beavers advised he was the caller who reported the most-recent domestic disturbance. Because he was suspected to be involved in a prior domestic

disturbance, officers handcuffed Beavers and had him sit in the backseat of a FTPD patrol vehicle.

6. A police officer spoke with Beavers and advised him of his Miranda Rights. The officer asked for consent to search Beaver's gray Dodge Ram, and Beavers consented. During the search, officers found a Glock, model 26, semiautomatic 9mm caliber pistol under the rear bench seat of the Dodge Ram. The Glock pistol was loaded with a magazine that contained ten 9mm rounds of ammunition. Officers found a clear plastic container with 75 multi-colored pills (later determined to contain methamphetamine and fentanyl) and two digital scales on the center console. Officers found sandwich bags and lottery tickets inside the center console. Based on my training and experience, I know that drug traffickers frequently use digital scales to measure controlled substances and they use sandwich baggies and lottery tickets to package controlled substances. On Beavers' key chain, officers found a blue aluminum container that contained a baggie with approximately 1.2 grams of heroin, another baggie with approximately .5 grams of crack cocaine, and another baggie with approximately .6 grams of methamphetamine.

7. On June 16, 2021, Flint Area Narcotics Group (FANG) Detective Tyler Stambaugh (FTPD) utilized a Tru-Narc scan to conduct tests of the suspected

narcotics seized from the Dodge Ram. The suspected 75 Ecstasy pills tested positive for fentanyl compound or methamphetamine. The suspected heroin tested positive for heroin with fentanyl compound or methamphetamine. The suspected crack cocaine tested positive for cocaine HCL and cocaine base. The suspected methamphetamine tested positive for fentanyl compound or methamphetamine.

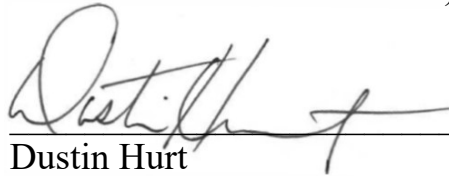
8. As part of this investigation, I had an opportunity to query the criminal history of Beavers which yielded the following:

- 1/13/1998 – Beavers received a juvenile adjudication for Felony Armed Robbery in the 7<sup>th</sup> Circuit Court of Michigan. CFN: 97109393.
- 12/4/1998 – Beavers pled guilty to Motor Vehicle-Unlawful Driving Away and Fleeing & Eluding the Police in the 7<sup>th</sup> Circuit Court of Michigan. CFN: 97001834FH. Beavers was incarcerated for one year and eight months to two years and six months.
- 6/28/2002 – Beavers pled guilty to Felony Receiving and Concealing Stolen Property in the 7<sup>th</sup> Circuit Court of Michigan. CFN: 01-007347-FH. Beavers was sentenced to 24 to 90 months incarceration.
- 4/2/2008 – Beavers pled guilty to Felon in Possession of a Firearm and Felony Firearm in the 7<sup>th</sup> Circuit Court of Michigan. CFN: 07-021883-FH. Beavers was sentenced to two years' incarceration.
- 11/9/2015 – Beavers was found guilty of Felon in Possession of a Firearm in the 7<sup>th</sup> Circuit Court of Michigan. CFN: 15-037448-FH. Beavers was sentenced to three to ten years' incarceration.

9. I am recognized by ATF as having expertise in the interstate travel and

manufacture of firearms. The Glock, model 26, semiautomatic 9mm caliber pistol and the 10 rounds of ammunition in the magazine were manufactured outside of the state of Michigan and are a firearm and ammunition as defined in Chapter 44, Title 18, United States Code.

10. Based on the foregoing, I have probable cause to believe that on June 14, 2021, in the Eastern District of Michigan, Donqia Jerome Beavers, violated 18 U.S.C. § 922(g)(1) (felon in possession of a firearm); 18 U.S.C. § 924(c) (carrying a firearm during and in relation to a drug trafficking crime); and 21 U.S.C. § 841(a)(1) (possession with intent to distribute controlled substances).



Dustin Hurt

Special Agent

Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means on this 10<sup>th</sup> day of November, 2021.



Hon. Curtis Ivy, Jr.

United States Magistrate Judge